

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

JUN 28 2018

David J. Bradley, Clerk

United States of America )

v. )

Dulce Rocio GONZALEZ-Garcia )

DOB: 1991 )

Citizenship: Mexico )

Case No. *18-1326-M*

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 27, 2018 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC § 952

Offense Description

Illegal Importation of a Controlled Substance / Approximately 10.60  
Kilograms of Cocaine, a Schedule II Controlled Substance

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.*approved by*  
*1087 KSR*

Sworn to before me and signed in my presence.

Date: 06/28/2018*8:59 am**Nicholas C. Stott*

Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title

*Peter Ormsby*

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Peter Ormsby

Printed name and title

**Attachment "A"**

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On June 27, 2018, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection Office of Field Operations at the Pharr Port of Entry (POE) in Pharr, Texas. CBP Officers (CBPOs) detained Dulce Rocio GONZALEZ-Garcia (hereafter GONZALEZ), a citizen of Mexico, while attempting to enter the U.S. with approximately 10.60 kilograms (kg) of cocaine concealed within the floor of the Chevrolet Malibu passenger car she was driving.
2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. CBPOs referred GONZALEZ and the vehicle to secondary inspection for an intensive examination due to a computer lookout.
3. During secondary inspection, CBPOs conducted a non-intrusive X-Ray inspection and discovered anomalies in the floor of the vehicle. A CBP K-9 narcotics detection team conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from the vehicle.
4. A physical search of the vehicle was conducted and 10 cellophane wrapped, vacuum sealed and grease lined packages were discovered concealed within an aftermarket constructed concealed compartment in the floor of the vehicle. CBPOs field tested the substance inside the packages which were positive for the characteristics of cocaine.
5. Homeland Security Investigations (HSI), Special Agents (SA) responded to the Pharr POE to assist in the investigation. HSI SAs interviewed GONZALEZ who stated (post-Miranda warning) she was hired by an unknown person in Mexico and to be paid \$500.00 USD to transport what she suspected to be illegal items, specifically drugs, into the United States.
6. GONZALEZ will be charged with one count of Illegal Importation of a Controlled Substance, in violation of 21 USC § 952.